

MacNeill, O'Neill & Riveles, LLC

COUNSELLORS AT LAW

JAY SCOTT MacNEILL †
LAUREN KOFFLER O'NEILL † •
GARY L. RIVELES †
THOMAS J. PYLE, JR. •
ROBERT E. SPITZER •
PATRICIA M. WASON ◻

ETHAN LILLIANTHAL •
ANELIA DIKOVYTSKA BROWN •
ANTHONY A. DOSS

240 CEDAR KNOLLS ROAD-SUITE 104
CEDAR KNOLLS, NEW JERSEY 07927

(973) 409-6600
FAX (862) 260-9313

www.morlawnj.com

† CERTIFIED CIVIL TRIAL
ATTORNEY
• NJ AND NY BAR
◻ NJ, NY AND OH BAR
• NJ, NY AND MA BAR

September 14, 2020

Via efile

Honorable Leda Dunn Wettre, USMJ
US District Court for District of NJ
50 Walnut Street
Newark, NJ 07102-3551

RE: Polynice v. University Correctional Health Care
Docket No.: 2:19-cv-16875-MCA-LDW
MOR File No. 9028.05267

Dear Judge Wettre:

This firm has recently been retained to represent University Correctional Health Care and any and all of its employees who are named, but not yet served (collectively, "UCHC") in connection with the above-referenced matter. Recently, Plaintiff filed a Motion Seeking Leave to file an Amended Complaint. This Motion is currently returnable before Your Honor on September 21, 2020. Since we have just recently been retained to represent UCHC in this matter, I write to respectfully request that Plaintiff's Motion to File an Amended Complaint be carried one motion cycle to permit my firm to submit a response to Plaintiff's Motion.

The Court's courtesy and cooperation in this regard is greatly appreciated.

Respectfully submitted,

MACNEILL, O'NEILL & RIVELES, LLC

/s/ Thomas J. Pyle, Jr.

Thomas J. Pyle, Jr.

TJP/grd

cc: Michael Poreda, Esq.
Chanell Marie Branch, Esq.